

McDERMOTT WILL & EMERY LLP

Darren Azman
Joseph B. Evans
One Vanderbilt Avenue
New York, New York 10017-3852
Telephone: (212) 547-5400
Facsimile: (212) 547-5444

McDERMOTT WILL & EMERY LLP

Charles R. Gibbs (admitted *pro hac vice*)
Grayson Williams (admitted *pro hac vice*)
2501 North Harwood Street, Suite 1900
Dallas, Texas 75201-1664
Telephone: (214) 295-8000
Facsimile: (972) 232-3098

McDERMOTT WILL & EMERY LLP

Gregg Steinman (admitted *pro hac vice*)
333 SE 2nd Avenue, Suite 4500
Miami, FL 33131-2184
Telephone: (305) 329-4473
Facsimile: (305) 503-8805

Counsel to the Plan Administrator

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	Chapter 11
)	
VOYAGER DIGITAL HOLDINGS, INC., <i>et al.</i> ¹)	Case No. 22-10943 (MEW)
)	
Debtors.)	(Jointly Administered)
)	

**NOTICE OF FILING OF PROPOSED ORDER
APPROVING FIRST AMENDED LIQUIDATION PROCEDURES**

PLEASE TAKE NOTICE that the above-captioned debtors (collectively, the “Debtors”) toggled to the Liquidation Transaction pursuant to the *Third Amended Joint Plan of Voyager Digital Holdings, Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 1166-1] (the “Plan”).²

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Voyager Digital Holdings, Inc. (7687); Voyager Digital Ltd. (7224); and Voyager Digital, LLC (8013). The location of the Debtors’ principal place of business is 33 Irving Place, Suite 3060, New York, NY 10003.

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Plan.

PLEASE TAKE FURTHER NOTICE that on May 5, 2023, the Debtors, pursuant to Article IV.D.1 of the Plan, filed the Liquidation Procedures (the “Liquidation Procedures”).

PLEASE TAKE FURTHER NOTICE that on May 27, 2023 the Plan Administrator established under the Plan filed the *Notice of Filing of First Amended Liquidation Procedures* [Docket No. 1419] (the “First Amended Liquidation Procedures”).

PLEASE TAKE FURTHER NOTICE that the Plan Administrator hereby files the proposed *Order (I) Approving First Amended Liquidation Procedures and (II) Granting Related Relief* (the “First Amended Liquidation Procedures Order”), attached hereto as Exhibit A.

PLEASE TAKE FURTHER NOTICE that the hearing at which the United States Bankruptcy Court for the Southern District of New York (the “Court”) will consider approval and entry of the First Amended Liquidation Procedures Order will be held before the Honorable Michael E. Wiles of the United States Bankruptcy Court for the Southern District of New York on **June 6, 2023, at 11:00 a.m. (prevailing Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that copies of the First Amended Liquidation Procedures and other papers filed in these chapter 11 cases may be obtained free of charge by visiting the website of Stretto at <https://cases.stretto.com/Voyager>. You may also obtain copies of the First Amended Liquidation Procedures and other papers filed in these chapter 11 cases by visiting the Court’s website at <http://www.nysb.uscourts.gov> in accordance with the procedures and fees set forth therein.

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Dated: New York, New York
June 5, 2023

McDERMOTT WILL & EMERY LLP

/s/ Darren Azman

Darren Azman
Joseph B. Evans
One Vanderbilt Avenue
New York, NY 10017-3852
Telephone: (212) 547-5400
Facsimile: (212) 547-5444
E-mail: dazman@mwe.com
E-mail: jbevans@mwe.com

and

Charles R. Gibbs (admitted *pro hac vice*)
Grayson Williams (admitted *pro hac vice*)
2501 North Harwood Street, Suite 1900
Dallas, TX 75201
Telephone: (214) 295-8000
Facsimile: (972) 232-3098
E-mail: crgibbs@mwe.com
E-mail: gwilliams@mwe.com

and

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Miami, FL 33131-2184
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